



State of Ohio Environmental Protection Agency

Northeast District Office
2110 E. Aurora Road
Twin Oakes, Ohio 44087-1969
(216) 591-9171

Richard F. Celeste
Governor

Hand Copy

Trombly County

May 7, 1987

RE: GMC-BOC LORDSTOWN ASSEMBLY
OHD 020-632-998
#02-78-0356

3/31/87 Inspection

GMC-BOC Lordstown Assembly
2300 Hallock-Young Road
Box 1406
Warren, Ohio 44482

Attn: Mr. T. E. Will, Director,
Plant Engineering

Dear Mr. Will:

I appreciate the cooperation of Ben Kristan and Julie Blackburn with my hazardous waste inspection on March 31, 1987. Enclosed is a copy of the inspection report. The following violations and/or concerns were noted.

1. F001 was listed in storage (S01) on the Facility Annual Waste Report for 1986. The Part A filed December 17, 1981 does not include F001. [40 CFR 270.71/OAC 3745-50-51]
2. The personnel training records are incomplete. Job descriptions and a list of job titles with the employees' names filling those positions were available in your records only for management level employees. The job titles and descriptions for those employees that actually containerize, transfer, transport, label and generate the wastes were not available. Also, the names of all employees filling each of those positions were not recorded. [40 CFR 265.16(d) & (e) and 262.34/OAC 3745-65-16(D) & (E) and 52-34]
3. Although training was provided for management level employees between July and September of 1986 and training was provided for approximately 700 laborers, your facility could not document that all employees involved in handling, collecting, transporting, and etc. of hazardous wastes were trained. [40 CFR 265.16(a)(b) and (c) and 264.34/OAC 3745-65-16(A), (B), & (C) and 52-34]
4. The Contingency Plan needs to clarify the chain of command for emergencies. If the primary coordinator (Chief of Plant Security) is absent, who makes the decision which secondary coordinator will take on the responsibility of the primary coordinator? The plan is not clear who would be the sole coordinator if the primary is absent and both a fire and spill occurred. [40 CFR 265.52/OAC 3745-65-52]
5. Two overpack drums were not on pallets and were in about 3 inches of standing water. One drum had a residue of waste running down the outside of that drum and waste residue was apparent on the ground below that drum. [40 CFR 265.173(b)/OAC 3745-66-73(B)]

6. The container inspection reports must also include the date corrective actions were taken: [40 CFR 265.15, and .73/OAC 3745-65-15 and .73]
7. The tank inspections are inadequate. The discharge control equipment (e.g. waste feed cut-off valves and drainage systems) must be inspected at least once each operating day to ensure that it is in good working order. At least once each operating day the pressure and temperature gages on Tank #14 must be monitored to ensure that the tank is being operated in accordance with its design. The level of waste in the tanks must be inspected at least once each operating day. The construction materials of the tank must be inspected at least once per week to detect corrosion or leakage. The construction materials of the area immediately surrounding the tanks (e.g. dikes, discharge confinement structures) must be inspected at least weekly to detect erosion or leakage. [40 CFR 265.194/OAC 3745-66-94]
8. The inspection schedule must include the items and frequencies listed above. [40 CFR 265.15(b)/OAC 3745-65-15(B)]
9. The records of tank inspections were inadequate. They included only a column of unitless numbers and a "check for leaks" column. The records must include as a minimum, the date and time of the inspection, the name of the inspector, a notation of observations made, and the date and nature of any repairs or remedial actions. The records and results of these inspections must be included in the operating log. [40 CFR 265.15 (d) and .73/OAC 3745-65-15(D) and -65-73]
10. Three undated full drums of waste paint thinner were observed on a pallet in an aisle of the plant. Satellite accumulation of up to 55 gallons of hazardous wastes can occur only at or near the point where the wastes initially accumulate, provided the area is under the control of the operator of the process generating the waste. When this is the case, the drums must be dated immediately when full and moved within three days to the drum storage pad. [40 CFR 262.34/OAC 3745-52-34]

Please address each of the above items immediately and submit written documentation within 30 days that your facility has returned to compliance with State and Federal Hazardous Waste Regulations.

After discussing the violations, I also discussed with Mr. Kristan several other outstanding issues. As you know, GMC-BOC-Lordstown Assembly was referred to the State of Ohio Attorney General for legal action following last year's inspection. Penalties and remedies are still pending concerning those violations. Chris Khourey completed a review of the Ground Water Quality Assessment Report and available ground water monitoring data including the data we received April 30, 1987. We also inspected the condition of the wells on October 14, 1986. The report was found to be incomplete and several issues remain unresolved. [40 CFR 265.93(d)(4) & (5)/OAC 3745-65-93(D)(4) & (5)] Additional monitoring and assessment will be required. The following comments relate to the Assessment Report, the groundwater monitoring data, and the condition of the wells.

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1. The casing of well number 6 appears to be crushed near the ground surface and inoperative. This well should be plugged with bentonite and re-drilled near its present location.
2. What is the source of lead in well numbers 2 and 9 (upgradient) and well number 8 (downgradient)? The sample reported in April 1986 for well number 2 had a Pb concentration of 0.380 mg/l.
3. What is the source of chromium in well number 2? The sample results reported for April, 1986 contained a Cr concentration of 0.300 mg/l. Chromium was also detected in well number 9 for the April, 1986 sampling.
4. The use of TOX for organic solvent detection does not indicate the level of toluene in the ground water. The lagoon effluent sample (Dames and Moore, May 1984 Table I) was reported to contain 1.36 mg/l of toluene in November, 1983. A priority pollutant scan for well number 9 (upgradient) and well number 8 (downgradient) was run on samples collected at an unspecified date and reported in Table 3 of the Dames and Moore 1985 report.
5. The monitoring parameters proposed in Appendix B-Table I of the May, 1984 Dames and Moore Report are approvable with the addition of the following parameters:

Total Dissolved Solids
Total Alkalinity
Nitrates-Nitrite - N to aid in interpretation
Ammonia - N of data
Calcium
Magnesium
Purgeable Aromatics to detect toluene
6. Quarterly sampling should be conducted for a period of one year. At the completion of the four quarterly analyses a completed tabulation of data should be provided to this office.
7. The proposed additional statistical method (Dames and Moore May, 1984 Report Addendum to Ground Water Monitoring Program) may assist your company in data analysis, but cannot be used for regulatory purposes regarding this site.

Please address the above comments related to the groundwater immediately. Within 30 days submit in writing to this office your intentions to perform the additional monitoring, re-drill well number 6, resolve the other outstanding issues, and submit a complete, adequate assessment report. Also, I have been informed that U.S. EPA has issued a contract to have a Compliance Monitoring Evaluation (CME) conducted at your facility within the next four months. The results of this investigation may indicate even more groundwater related work by GMC will be required. Should you have questions concerning this program you could call Jan DeLorenzo at (614) 462-8413 in the Ohio EPA Central Office.

GMC-BOC Lordstown Assembly
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Enclosed, please find a copy of the Plan Content Section of the Draft Closure Plan Review Guidance as requested.

Should you have any questions, please call me.

Sincerely,



Sheryl K. Slone
Environmental Engineer
Division of Solid and Hazardous Waste
Management

SKS/sp

Enclosures

cc: Joan DeMartin, Legal Section, Central Office
Mike Savage, DSHWM, Central Office
Dan Hankett, Attorney General's Office

3/31/01 11:30 - 6:45 PM

Date and Time of Inspection

No SAFETY EQUIPMENT NEEDED

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # 02-78-0356

GENERAL INFORMATION

U.S. EPA I.D. # OHD 020 632 998

Facility: GMC - ASSEMBLY Address: 2300 HALLOCK-YOUNG RD, Box 1406 City: WARREN
State: OHIO Zip Code: 44482 County: TRUMBULL Telephone: 216-824-5512

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>BEN KRISTAN</u>	<u>MECHANICAL ENGINEER</u>	<u>216-824-5795</u>
2.	<u>JULIE BLACKBURN</u>	<u>CHEMICAL ENGINEER</u>	<u>216-824-5795</u>
3.			

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	<u>SHEPPY SLONE</u>	<u>ENVIRONMENTAL ENGINEER</u>	<u>216-425-9171</u>
2.			
3.			

INSTALLATION ACTIVITY

Mark One

If the site is a TSDF, check the boxes indicating which areas were reviewed.

- ☐ Generator only (G)
☐ Transporter (T)
☐ TSDF only
☐ G-T
☒ G-TSDF
☐ T-TSDF
☐ G-T-TSDF

- ☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure
☒ Containers S01
☒ Tanks S02/T01
☐ Surface Impoundments S04/T02
☐ Incineration/Thermal Treatment

- ☐ Waste Piles S03
☐ Land Treatment D01
☐ Landfills D80
☐ Chemical/Physical/Biological T04
☐ Groundwater Monitoring
☐ Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

- | | Yes | No | N/A | Remark # |
|---|-----|----|-----|-----------|
| 1. Has the facility submitted a Part A to Ohio? | ✓ | — | — | — |
| 2. If "yes", is it complete and accurate? | — | ✓ | — | #1 |
| 3. Has the facility submitted a Part B? | ✓ | — | — | — |
| 4. Was advance notice of the inspection given? If so, how far in advance? | ✓ | — | — | (± 2 WKS) |

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling. *submitted in the Part B in 11/85*

- #1 Form 3 of the Hazardous Waste Permit Application *submitted in the Part B in 11/85* lists only D001, D002 and D003 wastes. The annual ^{Generator} report submitted for 1986 indicates D001, D002, D003, D009, and F006 are generated. Discussion with the facility representative indicates D001, D002, D003, D009, F001, F002 and F005 are currently generated. The part A submitted in 1981 lists D001, D002, D003, D005, D006, D007, D008, D009, D010, F002, F005 and F006.

This facility assembles passenger cars and vans.

The hazardous waste storage units include:

1. A drum storage pad.
2. One outside tank (#14), horizontal, contains waste thinner from van plant through direct piping, 15000 gallon capacity
3. One inside tank (#1), vertical, rectangular, contains waste paint and thinner pumped from 55 gallon drums &/or 550 gallon tote tanks from passenger plant, 5000 gallon capacity
4. Two drying beds and two lagoons are closed.

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	✓	—	—	—
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	—	✓	—	—
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)) [3745-65-01]	✓	—	—	—
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	✓	—	—	—
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	✓	—	—	—
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	✓	—	—	—
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	✓	—	—	—
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	✓	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	✓	—	—	—
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	✓	—	—	—
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	✓	—	—	—
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]	—	—	✓	—
7. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	—	—	✓	—
b) The date that accumulation began is clearly marked on each container.	—	✓	—	#3
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]	✓	—	—	#1
9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].	—	✓	—	#2

RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

- #1 Training was provided for management level employees between July and September of 1986. An outside consultant provided training for approximately 700 laborers. Sign-in sheets were signed but the facility did not have these job descriptions with a list of the employee's names filling these jobs so they were not certain if all employees involved in handling, collection, transportation, etc. of hazardous wastes were trained.
- #2 Company only has job titles, job descriptions and employee's names filling these positions, for the management level employees. The employees that actually containerize, transport, transfer and generate the wastes are not listed by job title and a list of these job titles with their respective descriptions is not given.
- #3 Three undated full drums on pallet in aisle. "Paint-thinner" was stenciled on the drums and a label bearing the ERM waste number and someone's initials was affixed to the drums but none were dated. Nearby, one more drum was being filled.

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

Yes No N/A Remark #

Subpart B: General Facility Standards

1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)]

☒

2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. (Section 265.13(b)) [3745-65-13(B)]

☒

3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)]

☒

b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]

☒

IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".

4. The facility has -

a) A 24-hour surveillance system, or

☒

b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]

☒

5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]

☒

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15]		✓		#1
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)]	✓			
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-65-16(A)(B)(C)]	✓			#2
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)]		✓		#3
9. If required due to the actual hazards associated with Ignitable, Reactive or Incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]				
a) Protection from sources of ignition.	✓			
b) Physical separation of incompatible waste materials.	✓			
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	✓			
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)]			✓	

#1 The container inspection form should have a column added to record the date corrective actions were taken. Tank inspections were inadequate.

#2 See comment #1 Generator Requirements.

#3 See comment #2

RCRA INTERIM STATUS INSPECTION FORM

Subpart C: Preparedness and Prevention

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31]	—	✓	—	—
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]				
a) Internal alarm system.	✓	—	—	—
b) Access to telephone, radio or other device for summoning emergency assistance.	✓	—	—	—
c) Portable fire control equipment.	✓	—	—	—
d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers.	✓	—	—	—
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33]	✓	—	—	—
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]	✓	—	—	—
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement of emergency or spill control equipment is maintained. (265.35) [3745-65-35]	✓	—	—	—
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]	✓	—	—	—
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]	—	—	✓	—

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:
 - a) Actions to be taken by personnel in the event of an emergency incident. ✓ — — #1
 - b) Arrangements or agreements with local or state emergency authorities. ✓ — — —
 - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. — ✓ — #1
 - d) A list of all emergency equipment including location, physical description and outline of capabilities. ✓ — — —
 - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)] ✓ — — —
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)] ✓ — — —
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54] ✓ — — —
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55] ✓ — — —
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)] — — ✓ —

#1 The chain of command needs to be clarified for emergencies. If the primary coordinator (Chief of Plant Security) is absent, who makes the decision which secondary coordinator will take on the responsibility of the primary coordinator. The plan is not clear on who would be the sole coordinator if the primary is absent and both a fire and spill are involved.

CONTINGENCY AND EMERGENCY - 1

Revised 12/84

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:

- a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]
- b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
- c) The estimated (or actual) weight, volume or density of the waste material(s).
- d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
- e) The present physical location of each hazardous waste within the facility.
- f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)]
- g) Records of any waste analyses and trial tests required to be performed.
- h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).
- i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]
- j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<u>NOTE:</u> THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO <u>ONLY</u> OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.				
3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) <u>or</u> the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

#1 See comment #1 General Facility Standards.

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

- | | | | | |
|--|-------------------------------------|--------------------------|-------------------------------------|--------------------------|
| 1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| a) A description of how and when the facility will be closed. (265.112(a)(1)) [3745-66-12(A)(1)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) A description of how any of the applicable closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) A description of steps taken to decontaminate facility equipment. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) The year closure is expected to begin and a schedule for the various phases of closure. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart II: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]

a) A closure trust fund, or

b) A surety bond, or

c) A closure letter of credit, or

d) A combination of financial mechanisms.

e) FINANCIAL TEST

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?

3. When was the most recent estimate made?

4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?

5. When was the most recent estimate made?

—	—	—	—
—	—	—	—
—	—	—	—
—	—	—	—
✓	—	—	7/28/86
✓	—	—	1,450,000
—	—	—	2/17/87
—	—	✓	—
—	—	✓	—

REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]	✓	—	—	—
b) In good physical condition (265.171) [3745-66-71]	✓	—	—	—
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	✓	—	—	—
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	✓	—	—	—
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	—	✓	—	#1
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	✓	—	—	—
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	✓	—	—	—
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	✓	—	—	—
#1 Two overpack drums were not on pallets and were in about 3 inches of standing water. One drum had wastes running down the outside of the drum and dripping onto ground.				

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart J: Storage in Tanks

- | | | | | |
|---|---|---|---|----|
| 1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17 and 265.192(b) [3745-66-92(B)] and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192(d) [3745-66-92(D)]. | ✓ | — | — | #1 |
| 2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide. (265.192(c)) [3745-66-92(C)] | — | — | ✓ | — |
| 3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard. (265.194) [3745-66-94(A)(B)(C)] | — | ✓ | — | #2 |
| 4. Weekly inspections are made of all tank construction materials and containment structures. (265.194) [3745-66-94(D)(E)] | — | ✓ | — | #2 |
| 5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (265.193(a)) [3745-66-93(A)(B)] | | | | |
| a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record. | — | — | ✓ | — |
| b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record. | — | — | ✓ | — |

- #1 Part B indicates both tanks have manual wastefeed cutoff valves.
- #2 Tank inspection reports contain only a column of numbers (apparently water levels) and "Check for Leaks" Column. The inspection report needs to include all items to be inspected, the inspector's name, the time and date of the inspection, any deficiencies and the date and nature of repairs or corrective actions, for each tank. (Tank 14 also had pressure and temperature gauges. - Why aren't these monitored and record

RCRA INTERIM STATUS INSPECTION FORM

6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods: (265.198(a)) [3745-66-98(A)]

a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b) [3745-65-17(B)].

b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.

7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with HFA buffer zone requirements (Flammable and Combustible Code 1977). (265.198(b)) [3745-66-98(B)]

8. Incompatible waste materials are placed in the same tanks or put in contaminated tanks only under completely controlled and safe conditions as specified in Section 265.17(b). (265.199) [3745-66-99(A)(B)]

9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of. (265.197) [3745-66-97]

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
_____	<input checked="" type="checkbox"/>	_____	_____
<input checked="" type="checkbox"/>	_____	_____	_____
_____	_____	_____	<u>UNKNOWN</u>
_____	_____	<input checked="" type="checkbox"/>	_____
_____	_____	<input checked="" type="checkbox"/>	_____